



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

970121
EC-2

May 23, 1997

Reply To
Attn Of: ECO-088

Ref: 96-063-AFS

Jackie Andrew
Lowman Ranger District, HC-77
Boise National Forest
Box 3020
Lowman, Idaho 83737

Re: Deadwood Ecosystem Analysis '96 Draft Environmental Impact Statement (EIS)

The Environmental Protection Agency has received the Deadwood Ecosystem Analysis '96 draft EIS for review in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

Based upon a limited review, we have rated the draft EIS EC-2 (Environmental Concerns - Insufficient Information). We are concerned that implementation of best management practices and associated mitigation measures may not ensure protection of beneficial uses of streams and rivers within and downstream of the project area. It is not clear that mitigation measures implemented on past projects have helped to offset the impacts from timber harvest and related activities. Additional information (such as results of effectiveness monitoring efforts) should be included in the final EIS on how proposed BMPs and mitigation measures will, in fact, offset the impacts of the proposed road construction and timber harvest activities. We also are concerned that implementation of the preferred alternative would result in the loss of the roadless characteristics of the project area, increased habitat fragmentation/disruption, degradation of air quality, exacerbation of noxious weed problems on the Boise Forest, overall cumulative effects associated with the proposed action, and a reduction in primitive backcountry recreational opportunities. We hope to work with the Boise National Forest in the future to resolve these issues at the broader management planning level.

An explanation of the rating system we have used in our review is enclosed for your reference. This rating and a summary of these comments will be published in the Federal Register. We appreciate the opportunity to review the draft EIS for this project. Should you have any questions, please contact Bill Ryan at (206) 553-8561.

Sincerely,

Richard B. Parkin, Manager
Geographic Implementation Unit

Attachment

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO - - Lack of Objections

The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.